

Mon May 19 14:42:11 EDT 2014
Leavy.Jacquelene@epamail.epa.gov
FW: Artificial turf in the US
To: CMS OEX@epamail.epa.gov

From: Kelly Fraasch [mailto:kfraasch@childrens.org]
Sent: Monday, May 19, 2014 2:19 PM
Subject: Artificial turf in the US

Dear Ms. McCarthy:

Please find attached a letter that I will mail via hard copy today regarding my concerns about artificial turf surfaces in the United States.

Also please find the attached link (<http://www.childrens.org/reports/turf/>) with CHH's report, **Artificial Turf: Exposures to Ground Up Rubber Tires-Athletic Fields, Playgrounds, Garden Mulch**.

that I reference in my letter.

I am requesting for additional research and studies done on artificial turf, specifically with the increased exposure to young children, pregnant females, special needs population and the general public.

I truly appreciate any time you take to read my letter.

Sincerely yours,

Kelly Fraasch

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kfraasch@childrens.org

KELLY FRAASCH
Commissioner, Ward 5
Mt Lebanon Municipality
710 Washington Road
Pittsburgh, PA 15228

US Environmental Protection Agency
Attention: Gina McCarthy
Mail Code: 1101A
1200 Pennsylvania Avenue NW
Washington, DC 20460

May 14, 2014

Dear Ms. McCarthy,

Thank you very much for your service to our country and your leadership of the EPA. You have an excellent reputation as an advocate for common-sense strategies to protect public health and the environment along with leading the EPA.

I want to share with you a grave concern I personally have as a resident in my community but also as a citizen in this country. I believe it speaks to the heart of your mission and role with the EPA.

I am a Commissioner in a small suburb of Pittsburgh just 6 square miles with 33,000 people. As you know Pittsburgh area residents, community leaders and elected officials have taken great pride in the efforts made to combat the history of pollution in our waterways and air. We understand we have a long way to go, but have come a very long way in recent decades. Nothing is quick or easy when it comes to making widespread systemic changes.

In 2012, as a recently elected Commissioner, I began learning about the desire for some residents to add artificial turf for our community. My initial concerns about artificial turf stemmed from basic common knowledge about the high risk of infections and the burns from rubbing on the plastic blades. I was also aware that athletes tend to prefer grass over turf to prevent toe, foot, ankle and knee injuries.

However given multiple items of information from an advocate of turf, I began reading several studies that left far more questions than answers. The inconsistencies bothered me. I understand it's a very complex issue but feel strongly further review is necessary which leads me to you.

Turf providers boast that they are growing and growing with more and more fields being placed throughout the country. The growth in the industry is occurring because advocates of turf are pushing harder and harder on elected officials to invest in artificial fields typically with tax dollars.

Turf advocates are pushing to see children as young as three on these turf surfaces playing tot soccer and t-ball. As a mother, I know that you understand a young child's attraction to seeing tiny pellets of tire crumbs. They are going to want to eat the pellets, not ignore them.

Again, turf advocates are pushing for these fields with little information about potential long-term effects are on the youngest or most vulnerable citizens and our environment because it hasn't been fully studied.

In what country with all the freedom and spirit we have to engage, educate and try and provide the best lives for ourselves would anyone find it remotely reasonable to have artificial fields placed in our parks and green spaces throughout the country and not give pause to the overall potential of health and environment concerns that are being raised by TOP health experts in the world?

Our country spends millions, if not billions, on various health causes each and every year from autism to cancer, but why are we not investing funds to research a product that lays on the surface of our former natural grass fields with these chemicals being exposed to children, infants, pregnant women, the aging, the disabled, and the general public?

With all the resources our country has we should invest time and energy into finding out exactly who might be vulnerable, what could occur short-long term for all users? But what is most important, if what we expect is true that artificial turf is toxic and harmful to people we begin a mass effort to educate the public and develop solutions to the potential problem.

I have enclosed a copy of the EHHI's document, *Synthetic Turf Exposures To Ground-Up Rubber Tires-Athletic Fields, Playgrounds, Gardening Mulch* (www.ehhi.org/reports/turf/) and want to reference one piece, on the summary that speaks to the heart of my letter,

"There have been some studies done on the health effects from exposures to the rubber crumb material, but many of these studies present only partial assessments of the human health risk potential. In addition, many studies have major data gaps with respect to the chemicals released, as well as the actual levels of exposures in humans and the environment.

From the available information, it was found that tire crumbs contained volatile organic hydrocarbons (VOCs) with carcinogenic potential, which could be extracted from the crumbs in the laboratory. Health reports from workers in the rubber fabrication industry and in the rubber reclamation industry describe the presence of multiple volatile organic hydrocarbons, semivolatile hydrocarbons, and other toxic elements in the air. Studies at tire reclamation sites report the leaching of similar sets of chemicals into the ground water. Occupational studies document a spectrum of health effects, ranging from severe skin, eye, and respiratory irritation to three forms of cancer.¹

The relationship between exposures affecting the rubber workers and those experienced by people using athletic fields, or children in playgrounds covered with ground-up rubber tire material is not known, but we do know that many of the same chemicals that rubber workers are exposed to are being released from the ground-up rubber tire crumbs."

Why aren't we studying these gaps? Is it a matter of voices asking for help? Having a leader in your role stand up and address the issue? Is it funding? Is it maybe that a majority of this country is uneducated

about the topic and just simply doesn't know better (which I would have been in that category a year ago) or is it a huge corporate machine that holds back answering the questions? I am fully aware the questions may not have answers.

Again, I am asking you as a mother and elected official of a township to please work in filling in the gaps. Help bring resources throughout this country together and find answers. This isn't about just a field this is about future generations and the exposures that artificial fields can affect this country's health and environment.

Please follow through on the items outlined in the article dated December 2013, *More Studies Needed on Artificial Turf Fields, EPA says* and help advance efforts to see studies are done on women, children, disabled, elderly as well as all athletes so everyone knows and understands any risks that might be associated with use or even close proximity of an artificially turf field.

Please have top research experts study the other issues that impact turf which include flame retardants that are now used on the fields, dangers of plastics in heat and all environmental impacts associated with turf. Even though I haven't shared much of my concerns affecting the environment I am equally concerned about the water runoff, impact on the overall global climate and the potential of negative consequences on the wildlife in our waterways.

I never imagined I would feel so compelled to write you. However I have found throughout my life that people before me stood up when they didn't see something right and made my life and the life of my children better. I needed to do all that I could to communicate my concerns about this issue and stand up and say something. I certainly write in the spirit of wanting to help in any way I can to see this issue addressed nationally and hope that you will consider this issue as a top priority.

I would also like to know your thoughts and feedback on the overall concerns I've outlined in this letter. As a community that hasn't stripped our natural grass for \$1+ million in artificial turf it would be imperative to know any opinion or information you can provide. Thank you very much for your time.

Sincerely yours,

Kelly R. Fraasch

Kelly R. Fraasch
Commissioner, Ward 5

cc: Jacqueline Mosby, Office of the Children's Health Protection
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